

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 07-22375-CIV-JORDAN/TORRES

JEANNETTE HAUSLER as Successor
Personal Representative of the Estate of
ROBERT OTIS FULLER, ("BOBBY FULLER")
Deceased, on behalf of THOMAS CASKEY
as Personal Representative of the Estate of
LYNITA FULLER CASKEY, surviving daughter
of ROBERT OTIS FULLER, The ESTATE OF
ROBERT OTIS FULLER, FREDERICK FULLER,
FRANCES FULLER, GRACE LUTES, JEANNETTE
HAUSLER, AND IRENE MOSS,

Plaintiffs,

vs.

THE REPUBLIC OF CUBA, FIDEL CASTRO RUZ,
individually and as President of the State
and Counsel of Ministers, Head of the Communist
Party and Commander-In-Chief of the Military,
RAUL CASTRO RUZ, individually and as First
Vice President of the Counsel of State and Council
of Ministers and Head of the CUBAN REVOLUTIONARY
ARMED FORCES, and EL MINISTERIO DEL INTERIOR,

Defendants.

**STIPULATION RELATING TO ADVERSE CLAIMS BETWEEN
PLAINTIFFS AND GARY ANDERSON AND ANA MARGARITA
MARTINEZ AND WITHDRAWING SUPPORT OF AT&T CORP.'S
MOTION TO TRANSFER AND OPPOSITION TO
PLAINTIFFS' MOTION FOR JUDGMENT ON THE PLEADINGS**

This is a Stipulation by and between: Gary Anderson, in his capacity as the
Personal Representative of the Estate of Howard Anderson ("Anderson"); Ana Margarita
Martinez ("Martinez"); and Jeannette Fuller Hausler, as Personal Representative of the
Estate of Robert Otis Fuller, Deceased, Thomas Caskey, as Personal Representative of

the Estate of Lynita Fuller Caskey, Surviving Daughter of Robert Otis Fuller, the Estate of Robert Otis Fuller, Frederick Fuller, Frances Fuller, Grace Lutes, Jeannette Fuller Hausler, and Irene Moss (collectively, the "Fuller/Hausler Plaintiffs," and, collectively with Anderson and Martinez, the "Judgment Creditors").

WHEREAS, certain of the Fuller/Hausler Plaintiffs served AT&T Corp. with Writs of Garnishment in Florida (the "Fuller/Hausler Writs"), which are now the subject of the above-captioned case;

WHEREAS, Frederick Fuller, Frances Fuller, Grace Lutes, Jeannette Fuller Hausler, and Irene Moss, in their individual capacities, are not asserting any claims pursuant to the Fuller/Hausler Writs;

WHEREAS, Jeannette Fuller Hausler, as Personal Representative of the Estate of Robert Otis Fuller, Deceased, and Thomas Caskey, as Personal Representative of the Estate of Lynita Fuller Caskey, continue to pursue garnishment against AT&T Corp. pursuant to the Fuller/Hausler Writs;

WHEREAS, Anderson and Martinez have asserted claims in this case as adverse claimants pursuant to Chapter 77 of the Florida Statutes;

WHEREAS, Anderson and Martinez filed their Response (D.E 44) to Plaintiffs' Motion for Judgment on the Pleadings and Garnishee AT&T Corp.'s Motion to Transfer, in which Anderson and Martinez supported AT&T Corp.'s Motion to Transfer and opposed the Fuller/Hausler Plaintiffs' Motion for Judgment on the Pleadings based on the existence of pending enforcement efforts in the United States District Court for the Southern District of New York;

IT IS HEREBY STIPULATED AND AGREED by the Judgment Creditors as follows:

1. Pursuant to an agreement between the Judgment Creditors, Anderson shall cease and desist his execution efforts pursuant to the Anderson writ in the Southern District of New York as to the accrued liability in the approximate amount of \$1.3 million which has been identified by AT&T Corp. (the "Accrued Liability"). Martinez shall also cease and desist her execution efforts against the Accrued Liability in the United States District Court for the Southern District of New York. Jeannette Fuller Hausler, as Personal Representative of the Estate of Robert Otis Fuller, Deceased, and Thomas Caskey, as Personal Representative of the Estate of Lynita Fuller Caskey, shall pursue execution against the Accrued Liability pursuant to the Fuller/Hausler Writs.

2. Anderson and Martinez are now in favor of the execution against the Accrued Liability remaining in the Southern District of Florida pursuant to the Fuller/Hausler Writs, and, by this Stipulation, they are withdrawing their Response to Plaintiffs' Motion for Judgment on the Pleadings and Garnishee AT&T Corp.'s Motion to Transfer (D.E 44).

3. The Fuller/Hausler Plaintiffs are not pursuing, and shall not pursue, any claim under the Fuller/Hausler Writs, or otherwise, related to the tax liabilities that are the subject matter of the turnover action styled as Gary Anderson v. AT&T Corp., Cuban American Telephone and Telegraph Company, and JPMorgan Chase Bank, N.A., Case No. 07-civ-7974, pending in the United States District Court for the Southern District of New York.

4. Pursuant to the agreement, the Fuller/Hausler Plaintiffs hereby dismiss the claim in Fuller/Hausler Writs against the funds in the blocked account denominated the

"AT&T Long Lines Account," Account Number G00875, at JPMorgan Chase Bank, in the approximate amount of \$6 million which AT&T claims are funds deposited by AT&T which are due and owing solely to the Cuban American Telephone and Telegraph Company (CATT) ("the CATT Funds").

5. Pursuant to the agreement, the Judgment Creditors are notifying the United States District Court for the Southern District of New York that the Fuller/Hausler Plaintiffs are not asserting any claim under the Fuller/Hausler Writs, or otherwise, related to the tax liabilities that are the subject matter of the turnover action styled as Gary Anderson v. AT&T Corp., Cuban American Telephone and Telegraph Company, and JPMorgan Chase Bank, N.A., Case No. 07-civ-7974, pending in the United States District Court for the Southern District of New York, and that they have dismissed the claim in the Fuller/Hausler Writs against the CATT Funds.

6. The parties agree that Anderson and Martinez shall remain as parties in this case as adverse claimants pursuant to Chapter 77 of the Florida Statutes to protect Anderson's and Martinez's rights to share in any recovery that the Fuller/Hausler Plaintiffs may obtain regarding the Accrued Liability.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system on January 29, 2008, which will send a notice of electronic filing to the following persons. Pursuant to Rule 3I of the Case Management Electronic Case Filing CM/ECF Rules, the undersigned has the consent of all three signers of the stipulation to make this filing.

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